

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Duke Energy Carolinas, LLC for
Adjustments in Electric Rate Schedules and TariffsBEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2018 - 319 - E

(Please type or print)

Submitted by: Hasala Dharmawardena

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda
expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input checked="" type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-319-E

IN RE:)	
)	
Application of Duke Energy)	HASALA DHARMAWARDENA
Carolinas, LLC, for Adjustment of)	POST-HEARING BRIEF
Rates and Charges Applicable to)	
Electric Service in South Carolina)	

I. INTRODUCTION

This matter comes before the Public Service Commission of South Carolina (the “Commission”) on the Application of Duke Energy Carolinas, LLC (“DEC” or the “Company”) filed November 8, 2018 requesting authority to adjust and increase its electric rates, charges and tariffs. The Application was filed pursuant to S.C. Code Ann. §§ 58-27-820 and 58-27-870 and 10 S.C. Code Ann. Regs. 103-303 and 103-823.

The Commission has jurisdiction over the rates and charges, rate schedules, classifications of public utilities operating in South Carolina, including DEC, as generally provided in S.C. Code Ann. §§ 58-27-10, et seq. S.C. Code Ann. § 58-3-140(A) vests the Commission with the “power and jurisdiction to supervise and regulate the rates and service of every public utility in this State” Every rate “made, demanded or received by any electrical utility ... shall be just and reasonable . . .” S.C. Code Ann. § 58-27-810.

In its application for an increase in its rates and charges, DEC proposed to increase the mandatory, fixed Basic Facilities Charge (“BFC”) for most residential

customers from \$8.29 to \$28.00 per month—an increase of 245 percent. As support for the proposed increase in the BFC, the Company used an analysis called the “Minimum System” method to classify certain costs as customer-related in its cost of service study.

Hasala Dharmawardena opposed the use of the Minimum System method that was the Company’s justification for the BFC increase.

II. ARGUMENT

1. DEC states that the minimum system method is proposed to minimize cross-subsidization between the different classes. Specifically the three classes of net-metered customers, holiday homes customers and the rest of the residential users. However, DEC does not provide any numbers on what the current cross-subsidization is based on either number of customers or in dollars and cents.
2. Even if it is accepted that there is an actual occurrence in cross subsidization, the decision to affect this humongous change to the rate structure, can only be a reasonable if it is supported by dollars and cents calculation provided by DEC.

III. PROPOSED FINDING AND CONCLUSIONS

In the light that DEC has not provided quantitative proof and only provides a qualitative assessment, Hasala Dharmawardena asks the Commission to make the following findings and conclusions:

1. DEC has not provided a financial analysis on what the existing cross-subsidization that they claim is, in dollars and cents.

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2. Therefore, DEC has no proof to support the claim that there is significant cross subsidization that requires a humongous change in distribution cost analysis in the first place.
3. Therefore, the company has failed to meet its burden of proving that the problem that they are trying to solve exists in the first place.
4. Therefore, the minimum system concept is not acceptable at this point of time.

Accordingly, Hasala Dharmawardena respectfully requests that the Commission deny the Company's request for usage of minimum system concept by DEC.

Respectfully submitted this 18th day of April, 2019.

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